

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT**

RYAN SHEPHERD, )  
                        )  
                        )  
Plaintiff,         )  
                        )  
                        )  
v.                     )      Case No. 23-14774  
                        )  
                        )  
DLA PIPER US LLP,     )      Honorable John Robert Blakey  
                        )  
                        )  
Defendant.         )

**JOINT STATUS REPORT**

Pursuant to this Court's order entered December 16, 2025 (Document #50), the parties submit the following updated joint status report:

1. Fact Discovery

The parties have completed the depositions of all fact discovery witnesses, including Anne Jarosz and Kathy Buenik, which were taken on December 16, 2025 and December 30, 2025 respectively. Plaintiff has pending a motion to compel the production of additional documents from DLA Piper.

2. Expert Discovery

Both parties plan to retain an expert dealing with the issue of COVID-19 and propose the following reasonable expert discovery schedule:

<b>Plaintiff to identify his expert and submit expert report</b>	<b>February 27, 2026</b>
<b>Defendant to depose Plaintiff's expert</b>	<b>March 31, 2026</b>
<b>Defendant to identify its expert and submit expert report</b>	<b>April 30, 2026</b>
<b>Plaintiff to depose Defendant's expert</b>	<b>May 29, 2026</b>

3. Settlement

**Pursuant to this Court's order dated December 16, 2025 (Document #50), the Plaintiff submitted his formal written settlement demand on the Defendant on January 6, 2026.**

**The Defendant submitted its settlement offer to the Plaintiff on January 15, 2026.**

**The parties have not agreed to a settlement conference before Magistrate Judge Jantz at this time, but will advise the Court if this changes and would then request that this Court refer the matter to Magistrate Judge Jantz to set such a conference.**

Respectfully submitted,

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